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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,
9 Plaintiff,

10 vs.

11 MIRIAM ELIZABETH SUAREZ-CONTRERAS
(1), aka “Ella” aka “Liz”,
12 RAMIRO RAMIREZ-BARAJAS (2),
aka “Sergio”,
13 ROBERTO BLANCAS-MATA (3),
aka “Carlos Delgado”,
14 **RAHDSMA HENDERSON (4)**, aka “Weezy”
15 STEPHEN LLOYD (5),
CHARLES PARR (6), aka “Charles Magnuson”,
16 DOUG STUMPF (7),
BRIAN SCARBOROUGH (8),
RENEA BARNES (9), aka “Renea Valdez”,
17 QUENTIN ARMSTRONG (10),
CIPRIANO PINEDA-ACEDO (11),
JOSE GUILLERMO TELLO-ALBARRAN 12),
20 and MARTHA PEDRAZA-ZAMORA (13),
21 Defendants.

CASE NO. 2:19-cr-0133-APG-VCF

**AMENDED STIPULATION AND
ORDER TO CONTINUE MOTIONS
(THIRD REQUEST)**

22 **IT IS HEREBY STIPULATED AND AGREED** by and between Nicholas A. Trutanich,
23 United States Attorney; Kevin D. Schiff, Assistant United States United, counsel for the United
24 States of America, and; Richard E. Tanasi, Esq., counsel for Defendant Miriam Elizabeth Suarez-
25 Contreras (1); Chris T. Rasmussen, Esq., counsel for Defendant Roberto Blancas-Mata (3); Paola
26 M. Armeni, Esq., counsel for Defendant, Rahdsma Henderson (4); Brian James Smith, Esq.,
27 counsel for Defendant Stephen Lloyd (5); Lance J. Hendron, Esq., counsel for Defendant Charles
28 Parr (6); Todd M Leventhal, Esq., counsel for Defendant Doug Stumpf (7); Gabriel L. Grasso, Esq.,

1 counsel for Defendant Brian Scarborough (8); James A. Oronoz, Esq., counsel for Defendant
2 Quentin Armstrong (10); and Rebecca A. Levy, Assistant Federal Public Defendant, counsel for
3 Defendant Jose Guillermo Tello-Albaran (11), Defendants, Ramiro Ramirez-Barajas (2); Cipriano
4 Pineda-Acedo (11); and Martha Pedraza-Zamora have not made an appearance, that the pretrial
5 motion deadline date was scheduled for December 23, 2019, be vacated and set to date and time
6 convenient to the Court.

7 **IT IS FURTHER STIPULATED AND AGREED** that the deadlines for filing of any and
8 all pretrial motions are hereby due on or before the 26th day of June, 2020.

9 **IT FURTHER STIPULATION AND AGREED** that the deadlines for filing of
10 responsive pleadings, are hereby due on or before the 10th day of July, 2020.

11 **IT FURTHER STIPULATION AND AGREED** that the deadlines for filing any and all
12 replies, are hereby due on or before the 17th day of July, 2020.

13 This Stipulation is entered into for the following reasons:

- 14 1. The pretrial motions deadline was December 23, 2019.
- 15 2. On June 6, 2019, the case was deemed complex case [DKT 89] as there are numerous
16 defendants and voluminous discovery.
- 17 3. Counsel and each Defendant needs additional time to review discovery.
- 18 4. The Government is in the process of providing plea offers that could potentially resolve this
19 matter for some or all the defendants. Defendant Barnes has already accepted a plea. Once offers
20 are received, defense counsel will need time to speak to their clients about the offers as well as the
21 case in general.
- 22 5. Only after the above communications with their clients, can Defense counsel make a final
23 determination if any pretrial motions are warranted and/or whether trial is in the best interest of
24 their client.
- 25 6. For these reasons, the parties cannot meet the current pretrial motion deadline of December
26 23, 2019.
- 27 7. Further, the additional time will avoid wasting judicial resources on matters that may
28 become moot after communications are had with the defendants.

8. Defendants Suarez-Contreras (1), Henderson (4), Stumpf (7), Scarborough (8), Armstrong (10), and Tello-Albaran (12) are detained and agree to the continuance.

9. Defendants Blancas-Mata (3), Lloyd (5), and Parr (6), who have appeared in this case are not in custody and long with the government agree to a continuance.

10. On December 12, 2019, Defendant, Renea Barnes changed her plea and the Court vacated the trial date as it related to her.

11. Defendants, Ramiro Ramirez-Barajas (2), Cipriano Pineda-Acedo (11) and Martha Pedraza-Zamora have not made an appearance in the above-captioned matter.

12. Additionally, denial of this requests for continuance could result in a miscarriage of justice.

13. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A), when considering the factors under 18 U.S.C. §§3161(h)(7)(B) and 3161(h)(7)(B)(iv).

14. The additional time requested herein is not sought for purposes of delay and the denial of this request for continuance could result in a miscarriage of justice.

15. For all the above-stated reasons, the ends of justice would be best served by the continuance of the deadlines of motions, calendar call and trial dates.

16. This is an amended third request for an extension of time to file pretrial motions.

DATED this 30th day of December, 2019.

NICHOLAS A. TRUTANICH
UNITED STATES ATTORNEY

/s/Kevin D. Schiff
KEVIN D. SCHIFF
Assistant United States Attorney

For Defendant Suarez-Contreras (1)

For Defendant Blancas-Mata (3)

/s/Richard Tanasi
Richard Tanasi, Esq.

/s/Chris Rasmussen
Chris T. Rasmussen, Esq.

For Defendant Rahdysma Henderson (4)

For Defendant Stephen Lloyd (5)

/s/Paola M. Armeni
Paola M. Armeni, Esq.

/s/Brian Smith
Brian James Smith, Esq.

1 For Defendant Charles Parr (6)

2 /s/Lance J. Hendron
3 Lance J. Hendron, Esq.

4 For Defendant Scarborough (8)

5 /s/Gabriel L. Grasso
6 Gabriel L. Grasso, Esq.

7 For Defendant Quentin Armstrong (10)

8 /s/James A. Oronoz
9 James A. Oronoz, Esq.

For Defendant Doug Stumpf (7)

/s/Todd M. Leventhal
Todd M. Leventhal, Esq.

For Defendant Renea Barnes (9)

/s/Mace J. Yampolsky
Mace J. Yampolsky, Esq.

For Defendant Jose Guillermo Tello-Albaran (12)

/s/Rebecca A. Levy
Rebecca A. Levy, Federal Public Defender

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

CASE NO. 2:19-cr-0033-APG-VCF

Plaintiff,

VS.

MIRIAM ELIZABETH SUAREZ-CONTRERAS (1), aka “Ella” aka “Liz”, RAMIRO RAMIREZ-BARAJAS (2), aka “Sergio”, ROBERTO BLANCAS-MATA (3), aka “Carlos Delgado”, **RAHDSMA HENDERSON (4)**, aka “Weezy” STEPHEN LLOYD (5), CHARLES PARR (6), aka “Charles Magnuson”, DOUG STUMPF (7), BRIAN SCARBOROUGH (8), RENEA BARNES (9), aka “Renea Valdez”, QUENTIN ARMSTRONG (10), CIPRIANO PINEDA-ACEDO (11), JOSE GUILLERMO TELLO-ALBARRAN (12), and MARTHA PEDRAZA-ZAMORA (13).

Defendants.

FINDINGS OF FACTS, CONCLUSIONS OF LAW AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

CONCLUSIONS OF LAW

Based upon the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. The pretrial motions deadline was December 23, 2019.
2. On June 6, 2019, the case was deemed complex case [DKT 89] as there are numerous defendants and voluminous discovery.
3. Counsel and each Defendant needs additional time to review discovery.
4. The Government is in the process of providing plea offers that could potentially resolve this matter for some or all the defendants. Defendant Barnes has already accepted a plea. Once

1 offers are received, defense counsel will need time to speak to their clients about the offers as well
2 as the case in general.

3 5. Only after the above communications with their clients, can Defense counsel make a final
4 determination if any pretrial motions are warranted and/or whether trial is in the best interest of
5 their client.

6 6. For these reasons, the parties cannot meet the current pretrial motion deadline of December
7 23, 2019.

8 7. Further, the additional time will avoid wasting judicial resources on matters that may
9 become moot after communications are had with the defendants.

10 8. Defendants Suarez-Contreras (1), Henderson (4), Stumpf (7), Scarborough (8), Armstrong
11 (10), and Tello-Albaran (12) are detained and agree to the continuance.

12 9. Defendants Blancas-Mata (3), Lloyd (5), and Parr (6), who have appeared in this case are
13 not in custody and long with the government agree to a continuance.

14 10. On December 12, 2019, Defendant, Renea Barnes changed her plea and the Court vacated
15 the trial date as it related to her.

16 11. Defendants, Ramiro Ramirez-Barajas (2), Cipriano Pineda-Acedo (11) and Martha Pedraza-
17 Zamora have not made an appearance in the above-captioned matter.

18 12. Additionally, denial of this requests for continuance could result in a miscarriage of justice.

19 13. The additional time requested by this Stipulation is excludable in computing the time within
20 which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A),
21 when considering the factors under 18 U.S.C. §§3161(h)(7)(B) and 3161(h)(7)(B)(iv).

22 14. The additional time requested herein is not sought for purposes of delay and the denial of
23 this request for continuance could result in a miscarriage of justice.

24 15. For all the above-stated reasons, the ends of justice would be best served by the continuance
25 of the deadlines of motions, calendar call and trial dates.

26 16. This is an amended third request for an extension of time to file pretrial motions.

27 17. The ends of justice are served by granting said continuances and outweigh the best interest
28 of the public and the Defendants' right to a speedy trial, since the failure to grant said continuance

would be likely result in a miscarriage of justice as it would deny the parties herein sufficient time, and the opportunity within which to effectively and thoroughly prepare and file pretrial motions, responses, and replies, and prepare for trial taking into account the exercise of due diligence.

ORDER

IT IS HEREBY ORDERED that the deadlines for filing of any and all pretrial motions are hereby due on or before the 26th day of June, 2020.

IT IS FURTHER ORDERED that the deadlines for filing of responsive pleadings, are hereby due on or before the 10th day of July, 2020.

IT IS FURTHER that the deadlines for filing any and all replies, are hereby due on or before the 17th day of July, 2020.

DATED this 30th day of December, 2020.

UNITED STATES DISTRICT COURT JUDGE
Case No. 2:19-cr-00133-APG-VCF